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November 5, 2016

Honorable John Michael Vazquez, U.S.D.J.
United States District Court for the District of New Jersey
U.S. Courthouse and Post Office Building
50 Walnut Street, Courtroom PO 03
Newark, New Jersey 07101

**Re: *Democratic National Committee, et al. v. Republican National Committee, et al.*,
Civil Action No.: 81-3876 (JMV) (JBC)**

Dear Judge Vazquez:

The Republican National Committee has reviewed the second Declaration of Michael Lieberman, filed at 6:14 pm last night by the Democratic National Committee. Mr. Lieberman claims that a Mr. Victor Santiago – after introducing himself initially as a poll observer for the *Trump campaign* – later brought up “the case the DNC filed” and claimed he was instructed not to disclose whether he was working for the RNC or even the Nevada Republican Party because of it. Under questioning by Mr. Lieberman, Mr. Santiago purportedly said that “everything was being coordinated by the RNC.”

Neither Mr. Robert Talbott, the RNC’s State Director for Nevada, nor Mr. Peter Graves, the Regional Political Director for Nevada, has heard of Mr. Santiago. The Declaration also reports no improper conduct that is prohibited by the Consent Decree. Unless the Court would find it helpful, the RNC does *not* intend to submit a Declaration addressing this latest submission.

Separately, the Temporary Restraining Order filed by the Southern District of Ohio yesterday against “Defendants Trump, Stone, and Stop the Steal—as well as their officers, agents, servants, and employees—and other individuals or groups, including groups associated with the Clinton for Presidency Campaign,” but denying relief against the Ohio Republican Party, is irrelevant to the issues in this case.

Respectfully submitted,

/s/ Bobby R. Burchfield
Bobby R. Burchfield

cc: DNC Counsel (by ECF)